

UNITED STATES DISTRICT COURT
Eastern District Of Massachusetts

FILED
IN CLERKS OFFICE

2004 NOV -2 P 2: 08

Boston Financial Corporation

Plaintiff,

v.

Prime Star, LLC,
Deborah A. Bartolini, John A. Bartolini,
Gregory C. Grant, and Jennifer R. Grant

Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Docket No. 04-11499-RCL

**AFFIDAVIT OF JOSEPH M. KLEMENTS IN SUPPORT OF PLAINTIFF'S
MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS
PRIME STAR, LLC , DEBORAH A. BARTOLINI and JOHN A. BARTOLINI**

I, Joseph M. Klements, of Boston, Suffolk County, Massachusetts, being first duly sworn, depose and say as follows:

1. Upon information and belief, Deborah A. Bartolini is over the age of 18 and is not incompetent.
2. Upon information and belief, John A. Bartolini is over the age of 18 and is not incompetent.
2. Upon information and belief, Prime Star, LLC is a limited liability company organized under the laws of Rhode Island with a principal place of business at 12 Gold Mine Road, Foster, Rhode Island.
3. The total amount due and owing the Plaintiff, Boston Financial Corporation under the Consulting/Factoring/Security Agreement attached to the amended complaint is \$133,989.68 as of the date of filing of the complaint in this action, as set forth on the Statement of Account attached hereto as Exhibit A.
4. The Plaintiff has incurred costs of \$823.65 in the course of bringing its claim for service of process, filing fees, and recording fees.
5. The plaintiff has incurred attorney's fees in the amount of \$7,750 in the course of bringing its claim. The contract and guarantees upon which this action is based provide for defendants' payment of plaintiff's attorneys fees.

Signed under the pains and penalties of perjury.


Joseph M. Klements

COMMONWEALTH OF MASSACHUSETTS

Suffolk, s.s.

~~October~~ 29, 2004

On this 29th day of October 2004, before me, the undersigned notary public, personally appeared **Joseph M. Klements**, proved to me through satisfactory evidence of identification, which were personal knowledge, to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.

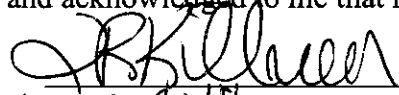

Lauren R. Kiltman Notary Public
My commission expires: 3/26/10

EXHIBIT A

10/26/04 09:31:07 AM
REPORT P714

BOSTON FINANCIAL CORPORATION
NET OUT REPORT 1
OPEN SCHEDULES FOR CLIENT 16600
AS OF 10/26/04

PAGE 1
NS3.72.12r 4/01

Company ID 01

CLIENT TOTALS

PRIME STAR, LLC.
144A DANIELSON PIKE
FOSTER, RI 02825

Client ID: 16600

Schedule Number	Schedule Date	Gross Amount	Payments /Credits	Open Balance	Advance	Earned Rebate	Earned Fees	Accrued Reserve	Accrued Fees	Total Fees	Payoff
17282	12/10/03	8,598.00	5,321.00	3,277.00	6,190.56	0.00	0.00	1,085.91	1,321.53	1,321.53	2,191.09
17286	12/11/03	8,105.00	480.00	7,625.00	5,835.60	0.00	0.00	-99.94	2,369.34	2,369.34	7,724.94
17302	12/16/03	20,107.00	0.00	1,310.00	943.20	0.00	0.00	-29.34	396.14	396.14	1,339.34
17331	12/19/03	11,852.00	835.00	1,130.00	1,414.80	0.00	0.00	170.87	379.33	379.33	959.13
17392	01/02/04	8,785.00	0.00	4,605.00	3,315.60	0.00	0.00	-32.70	1,322.10	1,322.10	4,637.70
17393	01/05/04	9,745.00	0.00	9,745.00	7,016.40	0.00	0.00	-42.88	2,771.48	2,771.48	9,787.88
17396	01/06/04	42,570.00	0.00	42,570.00	30,650.40	0.00	0.00	-149.00	12,068.60	12,068.60	42,719.00
17446	01/15/04	6,150.00	0.00	3,810.00	2,743.20	0.00	0.00	17.53	1,049.27	1,049.27	3,792.47
17471	01/21/04	6,087.00	0.00	6,087.00	4,382.64	0.00	0.00	60.87	1,643.49	1,643.49	6,026.13
17502	01/27/04	8,081.00	0.00	8,081.00	5,818.32	0.00	0.00	124.46	2,138.23	2,138.23	7,956.55
17516	01/30/04	6,904.00	0.00	2,814.00	2,026.08	0.00	0.00	50.94	736.98	736.98	2,763.06
17532	02/03/04	6,167.00	0.00	1,852.00	1,333.44	0.00	0.00	40.18	478.38	478.38	1,811.82
17547	02/06/04	5,613.00	0.00	2,323.00	1,672.56	0.00	0.00	56.69	593.75	593.75	2,266.31
17562	02/09/04	3,045.00	0.00	1,980.00	1,425.60	0.00	0.00	53.66	500.74	500.74	1,926.34
17580	02/12/04	9,094.00	0.00	9,094.00	6,547.68	0.00	0.00	271.00	2,275.32	2,275.32	8,823.00
17590	02/18/04	12,057.00	0.00	5,112.00	3,680.64	0.00	0.00	179.94	1,251.42	1,251.42	4,932.06
17615	02/20/04	6,210.00	0.00	2,855.00	2,055.60	0.00	0.00	105.63	693.77	693.77	2,749.37
17636	02/23/04	13,635.00	0.00	10,015.00	7,210.80	0.00	0.00	397.59	2,406.61	2,406.61	9,617.41
17661	02/27/04	5,825.00	0.00	2,000.00	1,440.00	0.00	0.00	86.60	473.40	473.40	1,913.40
17667	03/01/04	5,020.00	1,350.00	3,660.00	3,614.40	0.00	0.00	486.60	919.00	919.00	3,173.40
17688	03/05/04	9,317.00	1,682.79	7,634.21	6,708.24	0.00	0.00	754.93	1,853.83	1,853.83	6,879.28
CLIENT TOTALS:		212,967.00		137,579.21		0.00		3,589.53		37,642.71	
			9,678.79		106,025.76		0.00		37,642.71		133,989.68